

ANDREW R. TARDIFF
(MDB #1612140290)

andrew.tardiff@usdoj.gov

T: (202) 305-3284

EMILY A. DAVIS

(DCB #90017602)

emily.davis@usdoj.gov

T: (202) 305-0482

Trial Attorneys

Natural Resources Section

Environment and Natural Resources Section

United States Department of Justice

P.O. Box 7611

Washington, DC 20044-7611

*Attorneys for Defendant United States
Department of the Air Force*

LAURENCE (“LAIRD” J. LUCAS
ELIZABETH H. POTTER

Advocates for the West

P.O. Box 1682

Bend, OR 97709

PETER M. (“MAC”) LACY

Oregon Natural Desert Association

2009 NE Alberta St., Ste. 207

Portland, OR 97211

*Attorneys for Plaintiffs Oregon Natural
Desert Association, et al.*

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PENDLETON DIVISION

OREGON NATURAL DESERT ASS’N, et
al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF THE AIR
FORCE,

Defendant.

Case No. 2:24-cv-00145-HL

JOINT PROPOSED SCHEDULING
ORDER

JOINT PROPOSED SCHEDULING ORDER

Pursuant to the Court's order, ECF No. 21, the Parties have met and conferred and made a good-faith effort to propose a schedule for further proceedings in this matter.

As required by this Court's order, ECF No. 21, Defendant produced the administrative record on September 5, 2024, and Plaintiffs informed Defendant of their challenges to the completeness of the administrative record by October 11, 2024. Defendant responded to Plaintiffs' record objections on October 30, 2024, and committed to updating and recertifying the Administrative Record by December 6, 2024. Until Plaintiffs review the updated Administrative Record, they will be unable to determine whether a Motion to Complete is necessary. Accordingly, the parties propose that they submit a joint status report with a case schedule for briefing either a Motion to Complete or Motions for Summary Judgment no later than December 20, 2024.

Accordingly, the parties request that the Court enter the following schedule:

Deadline for Defendant to lodge and serve the updated Administrative Record	December 6, 2024
Deadline for parties to submit a proposed case schedule for either a Motion to Complete the Administrative Record or Summary Judgment Briefs	December 20, 2024

Respectfully submitted this 8th day of November, 2024.

TODD KIM
Assistant Attorney General

P.O. Box 7611
Washington, DC 20044-7611

s/ Andrew Tardiff
ANDREW TARDIFF
EMILY DAVIS
Trial Attorneys
Natural Resources Section
Environment and Natural Resources Section
United States Department of Justice

*Attorneys for Defendant United States
Department of the Air Force*

s/ Elizabeth H. Potter

LAURENCE (“LAIRD” J. LUCAS
ELIZABETH H. POTTER
Advocates for the West
P.O. Box 1682
Bend, OR 97709

PETER M. (“MAC”) LACY
Oregon Natural Desert Association
2009 NE Alberta St., Ste. 207
Portland, OR 97211

*Attorneys for Plaintiffs Oregon Natural
Desert Association, et al.*